



15 Roszel Rd, Ste 105, Princeton, NJ 08540 / P 609.318.5500 / trinityconsultants.com

January 28, 2022

United States Environmental Protection Agency
Region II
Air Compliance Branch
290 Broadway
New York, New York 10007-1866

*RE: Atlantic County Utilities Authority (ACUA) – PI Number: 70506
Permit Activity Number BOP210001
Annual Compliance Certification/2nd 2021 Semi-Annual Deviation
Subpart 000, NESHAP Subpart AAAA, and SSM Reports*

To whom it may concern:

On behalf of the Atlantic County Utilities Authority (ACUA), Trinity Consultants (Trinity) hereby submits the Annual Compliance Certification, second-half 2021 Semi-Annual Deviation, 40 CFR 62 Subpart 000, 40 CFR 63 Subpart AAAA, and Startup, Shutdown and Malfunction (SSM) Reports for the ACUA - Egg Harbor Township facility, as required under Condition 7 and Condition 13 of Subject Item FC, and Conditions 49 and 56 of Subject Item GR1, of the subject Title V air permit (BOP210001).

Should you have any questions or require additional information, please contact me at (609) 318-5500 x1755 or by email: mtrupin@trinityconsultants.com.

Sincerely,

TRINITY CONSULTANTS

A handwritten signature in black ink, appearing to read "Michael Trupin", is written over a light blue horizontal line.

Michael Trupin
Principal Consultant

Attachments

cc: Southern Regional Enforcement Office, NJDEP (Camden, NJ)
Mr. Gary Conover, ACUA (Egg Harbor Twp, NJ)

HEADQUARTERS

12700 Park Central Dr, Ste 2100, Dallas, TX 75251 / P 800.229.6655 / P 972.661.8100 / F 972.385.9203

ATTACHMENT 1
2nd 2021 SEMI-ANNUAL DEVIATION REPORT

Section I - Facility Information

1) Facility Name: Atlantic County Utilities Authority Landfill

2) Program Interest Number (5-Digit): 70506

The permittee shall submit to the Department and to the EPA, a periodic compliance certification, in accordance with N.J.A.C. 7:27-22.19(f) and the schedule for submittal of compliance certifications set forth in the compliance plan of your operating permit. **The annual compliance certification is due to the Department and the EPA within 60 days of the expiration of each 1-year anniversary of the Initial Operating Permit Approval Date, unless otherwise specified in your approved operating permit.**

3) Submittal Type: Combined (Choose from List)

4) Is this a revision of an already submitted report? No (Choose from List)

5) Reporting Year: 2021

6) This report is due: 01/30/2022
(MM/DD/YYYY)

and covers the reporting period from: 01/01/2021 to: 12/31/2021
(MM/DD/YYYY) (MM/DD/YYYY)

7) The methods used to determine the compliance status for each permit limitation are, at a minimum, as specified in the approved operating permit.

Section II - Compliance Certification Statement

Compliance Status for the Reporting Period:

☐ Pursuant to N.J.A.C. 7:27-22.19(f)1.i, I hereby state that this facility is currently in compliance with all applicable requirements as indicated in the facility specific requirements of my operating permit and has been in continuous compliance for the time period listed in Section I.3 above.

b. Pursuant to N.J.A.C. 7:27-22.19(f)1.i, I hereby state that this facility is currently in compliance with all applicable requirements as indicated in the facility specific requirements of operating permit but had periods of non-compliance during the time period listed in Section I.3 above which are listed in the Deviation Summary tab.

☒ c. Pursuant to N.J.A.C. 7:27-22.19(f)1.ii, I hereby state that this facility is in compliance with all applicable requirements as indicated in the facility specific requirements of my operating permit for the time period listed in Section I.3 above except those applicable requirements listed in the compliance schedule, included in my operating permit pursuant to N.J.A.C. 7:27-22.9(c)7, which includes a sequence of actions with milestones leading to compliance with the applicable requirement.

☐ d. Pursuant to N.J.A.C. 7:27-22.19(f)1.iii, I hereby state that this facility is in compliance with all applicable requirements for the time period listed in Section I.3 above as indicated in the facility specific requirements of my operating permit, except for those applicable requirements included in an order or consent decree not incorporated into a compliance schedule.

☐ e. Pursuant to N.J.A.C. 7:27-22.19(f)1.iv, I hereby state that this facility is currently not in compliance with at least one applicable requirement in the facility specific requirements of my operating permit, which are listed in the Deviation Summary tab.

☐ f. None of the above. This is a semi-annual report.



Section IIIa - Summary of Facility and Emission Unit Compliance Status

Add Rows		Insert Row	Set All
Permit Activity ID		ALL Operating Scenarios (OS), Steps (ST), Control Devices (CD), Emission Point (PT), Group (GR) and Equipment (E) listed under that UNIT or BP	Continuous Compliance Throughout the Reporting Period
		Emission Unit/Batch Process	
BOP210001		General Provisions and Authorities	No
BOP210001		FC	Yes
BOP210001		FG1	Yes
BOP210001		IS1	Yes
BOP210001		IS2	Yes
BOP210001		IS3	Yes
BOP210001		IS4	Yes
BOP210001		IS5	Yes
BOP210001		IS6	Yes
BOP210001		IS7	Yes
BOP210001		IS8	Yes
BOP210001		IS9	Yes
BOP210001		GR1	Yes
BOP210001		U1 includes OS0 (OS1, E101, CD1-3, PT1-3)	Yes
BOP210001		U2 includes OS0 (OS2, E201, CD4-5, PT5)	Yes
BOP210001		U3 includes OS0, OS1 and OS2 (E501, E601, PT6, PT7)	Yes
BOP210001		U4 includes OS0 (OS1, E701, PT8)	Yes
BOP210001		U5 includes OS0, OS1-OS6 (E901-903, PT9-11, E921-E923, PT21-23)	Yes
BOP210001		U7 includes OS0 (OS1, E801, PT12)	Yes
BOP210001		U14 includes OS0 and OS1 (E14, PT14)	Yes
BOP210001		U15 includes OS0 (OS1, E904, PT15)	Yes
BOP210001		U17 includes OS0 and OS1 (E15 and PT17)	Yes
BOP210001		U99 includes OS0 and OS1 (E99)	Yes
BOP210001		U100 includes OS0, OS1 and OS2 (E100, CD 100, CD101, CD102, PT100, PT101)	Yes
BOP210001		U101 includes OS0 (OS1, E906, PT102)	Yes
BOP210001		FG2	Yes
BOP210001		U102 includes OS0, OS1-OS3 (E924-926, PT103-105)	Yes
BOP200001		U6 includes OS0 (E1, PT1001)	Yes
BOP180001		FC	Yes
BOP180001		FG1	Yes
BOP180001		IS1	Yes
BOP180001		IS2	Yes
BOP180001		IS3	Yes
BOP180001		IS4	Yes
BOP180001		IS5	Yes
BOP180001		IS6	Yes
BOP180001		IS7	Yes
BOP180001		IS8	Yes
BOP180001		GR1	Yes
BOP180001		U1 includes OS0 (OS1, E101, CD1-3, PT1-3)	Yes
BOP180001		U2 includes OS0 (OS2, E201, CD4-5, PT5)	Yes
BOP180001		U3 includes OS0, OS1 and OS2 (E501, E601, PT6, PT7)	Yes
BOP180001		U4 includes OS0 (OS1, E701, PT8)	Yes
BOP180001		U5 includes OS0, OS1-OS6 (E901-903, PT9-11, E921-E923, PT21-23)	Yes
BOP180001		U7 includes OS0 (OS1, E801, PT12)	Yes
BOP180001		U14 includes OS0 and OS1 (E14, PT14)	Yes
BOP180001		U15 includes OS0 (OS1, E904, PT15)	Yes
BOP180001		U16 includes OS0 and OS1 (E15 and PT17)	Yes
BOP180001		U17 includes OS0 and OS1 (E15 and PT17)	Yes
BOP180001		U99 includes OS0 and OS1 (E99)	Yes
BOP180001		U100 includes OS0, OS1 and OS2 (E100, CD 100, CD101, CD102, PT100, PT101)	Yes
BOP180001		U101 includes OS0 (OS1, E906, PT102)	Yes
BOP180001		FG2	Yes

Section 111b - Summary of Facility and Emission Unit Compliance Status

Enforcement Action Activity Number	Communication Center Notification Number or Reported Date	Recurring Deviation of Requirement	List all Deviation Dates or Date Ranges	Deviation Discovery Date	Affirmative Defense Requested?	Did the Deviation Result in Excess Emissions?	Estimate the Amount of Emissions below		Describe the steps taken to correct the problem (i.e., steps taken to mitigate excess emissions, equipment repairs, etc.) and the preventive measures employed to avoid future incidents.	Comments
							Type of Contaminants	Amount (lbs.)		
PEA210001		No	10/01/2021	12/6/2021	No	No				ACUA has submitted a hearing request related to this AONOCAPA. Facility fence line monitoring does not agree with this enforcement action.

ATTACHMENT 2
2nd 2021 SEMI-ANNUAL NESHAP AND SSM REPORT



15 Roszel Rd, Ste 105, Princeton, NJ 08540 / P 609.318.5500 / trinityconsultants.com

January 28, 2022

Ms. Dore LaPosta
Director, Division of Enforcement and Compliance Assistance
USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866

*RE: Atlantic County Utilities Authority – Egg Harbor Township, NJ (P.I. # 70506)
Semi-Annual Subpart OOO, NESHAP Subpart AAAAA, and SSM Reports (2nd Half of 2021)*

Dear Ms. LaPosta:

This document has been prepared on behalf of the Atlantic County Utilities Authority (ACUA) for their landfill activities in Egg Harbor Township, New Jersey. Please accept this letter as the required semi-annual report for 40 CFR 62 Subpart OOO (Subpart OOO) until September 27, 2021 and 40 CFR 63 Subpart AAAAA (Subpart AAAAA) for the remainder of the year. This submittal also includes the required semi-annual Startup, Shutdown and Malfunction (SSM) report under the NESHAP regulations. SSM provisions were only in effect prior to September 28, 2021.

In accordance with 63.1981, ACUA is also certifying prior submission of respective NESHAP AAAAA reports under 40 CFR part 60 subpart WWW; 40 CFR part 60, subpart XXX; federal plan or EPA-approved and effective State Plan that implements either subpart Cc or Cf. This includes initial and amended (as applicable): design capacity report, NMOC emission rate report, collection and control system Design Plan as well as the initial performance test report.

The 40 CFR 60 Subpart WWW (Subpart WWW) regulations are no longer applicable to municipal solid waste (MSW) landfills. These regulations have effectively been superseded two times within 2021, first with the June 21, 2021 40 CFR 62 Subpart OOO effective date and next with the September 28, 2021 mandatory compliance date within 40 CFR Subpart 63 Subpart AAAAA. The regulations at 40 CFR 62.16724(h) from Subpart OOO require the submittal of reports to summarize the information recorded pursuant to (h)(1) through (h)(7). The regulations at 40 CFR 63.1981(h) from Subpart AAAAA (which effectively supersede all existing NSPS and Emission Guidelines, including Subpart OOO) require the submittal of reports to summarize the information recorded pursuant to (h)(1) through (h)(8). As such, ACUA will proceed with demonstrating compliance with the more stringent NESHAP Subpart AAAAA regulations (instead of NSPS Subpart WWW requirements referenced in dated permit documents). This action is consistent with the compliance demonstrations being performed in other States. Please also note that the NSPS Subpart WWW regulations (at 40 CFR 60.750(d)) indicate that a Subpart WWW facility must comply with the subpart until the facility becomes subject to the requirements in an approved and effective state or federal plan that implements Subpart Cf (i.e., consistent with the Federal Plan at 40 CFR 62 Subpart OOO).

A certification form for these reports is included in Attachment 1.

"

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SEMI-ANNUAL REPORT PER NESHAP SUBPART AAAA

The regulations at 40 CFR 62.16724(h) and 40 CFR 63.1981(h) require the submittal of reports to summarize the information recorded pursuant to (h)(1) through (h)(7) under Subpart OOO and (h)(1) through (h)(8) under Subpart AAAA. The following sections detail the regulatory requirements and provide the necessary information:

40 CFR 62.16724(h)(1) & 40 CFR 63.1981(h)(1) – Value and length of time for exceedance of applicable parameters monitored.

62.16722(a)(1) & 63.1958(b) – Pressure – There were no recorded exceedance of the operational standards for pressure listed at Subpart OOO and Subpart AAAA.

63.1958(c) – Temperature – There were no recorded exceedance of the operational standards for temperature listed at 40 CFR 60.1958(C)(1).¹

63.1958(d) – Methane Concentration – The below table provides a listing of monitoring locations where the monitored methane concentration was 500 parts per million or more above background during the quarterly surface monitoring events.

Location (per Report)	Latitude and Longitude	Initial Scan Date	Quarterly Result (PPM)	10-Day Re- Monitor Result (PPM)	Additional 10-Day Re- Monitor Result (PPM)	1-Month Re- Monitoring Result (PPM)
Q3 - #6	39.42530/-74.53719	09/17/2021	1,180	419	-	1
Q3 - #18	39.42525/-74.53630	09/17/2021	583	348	-	14
Q3 - #26	39.42636/-74.53751	09/17/2021	2,893	91	-	221
Q3 - #33	39.42689/-74.53663	09/17/2021	6,819	258	-	113
Q3 - #66	39.42868/-74.53860	09/17/2021	988	5	-	50
Q4 - #57	39.42472/-74.53406	10/18/2021	18,784	242		366
Q4 - #82	39.42880/-74.53759	10/18/2021	6,368	319	-	35

62.16726(c)(1)(i) & 63.1983(c)(1)(i) – Enclosed Flare Temperature – There were no 3-hour periods of operation during which the average combustion temperature was more than 82 degrees F below the average combustion temperature during the most recent performance test (required for an approved control system).² Additionally, the facility maintains records (at least every 15 minutes) of flare flow.

¹ Note that, per the GCCS Design Plan, the facility maintains a listing of Higher Operating Value wells, early installed collectors, abandoned wells, decommissioned wells, and temporarily decommissioned wells. Rather than include these evolving lists in these reports, the facility will continue to maintain these listings for review, if requested.

² Testing of the unit was performed on May 21, 2019. The average temperature from the May 21, 2019 testing was determined to be approximately 1669 degrees Fahrenheit. This value will be used as the average temperature from the most recent performance test.

40 CFR 62.16724(h)(2) & 40 CFR 63.1981(h)(2) – Description and duration of all periods when the gas stream is diverted from the control device through a bypass line or the indication of bypass flow as specified under 62.16722 and 63.1961.

There were no periods of time where landfill gas flow was diverted from either a control device or the gas treatment system (which provides gas to a third-party energy facility) to a bypass line (i.e., no free-venting of landfill gas occurred).

40 CFR 62.16724(h)(3) & 40 CFR 63.1981(h)(3) – Description and duration of all periods when the control device or treatment system was not operating and length of time the control device was not operating.

The open flare operated for 2 hours and 13 minutes on December 28, 2021 while the enclosed flare was down due to maintenance. Please note that the third-party gas to energy facility previously combusted landfill gas on a continuous basis, but the plant ceased operation prior to October 2021. Now, the enclosed flare is the primary gas control device and the open flare is only operated in specific situations. Regardless, the following periods of time represent enclosed flare downtime:

Date	Hours of Duration (Approx.)	Description
07/20/2021	0 HR & 7 MIN	Power Outage
07/27/2021	0 HR & 30 MIN	Power Outage
07/31/2021	0 HR & 38 MIN	Power Outage
09/07/2021	7 HR & 57 MIN	Thermocouple Replaced
09/13/2021	0 HR & 39 MIN	Thermocouple Replaced
09/16/2021	0 HR & 03 MIN	Thermocouple Replaced
09/27/2021	1 HR & 06 MIN	Thermocouple Replaced
09/28/2021	0 HR & 20 MIN	Thermocouple Replaced
10/08/2021	0 HR & 29 MIN	Power outage
10/11/2021	0 HR & 35 MIN	Power outage
12/02/2021	0 HR & 32 MIN	Power outage
12/19/2021	0 HR & 11 MIN	Power outage
12/20/2021	1 HR & 00 MIN	Power outage
12/28/2021	1 HR & 40 MIN	Maintenance

40 CFR 62.16724(h)(4) & 40 CFR 63.1981(h)(4) – All periods when the collection system was not operating.

The table below summarizes the periods in which the gas collection and control system was not operating.

Date	Hours of Duration (Approx.)	Description
10/08/2021	0 HR & 29 MIN	Power outage
10/11/2021	0 HR & 35 MIN	Power outage
12/02/2021	0 HR & 32 MIN	Power outage
12/19/2021	0 HR & 11 MIN	Power outage
12/20/2021	1 HR & 00 MIN	Power outage

40 CFR 62.16724(h)(5) & 40 CFR 63.1981(h)(5) – The location of each exceedance of the 500 parts per million methane concentration provided in 62.16716(d) and 63.1958(d) and the concentration recorded at each location for which an exceedance was recorded in the previous month.

Detailed surface methane concentration status is reported under 40 CFR 62.16724(h)(1) & 40 CFR 63.1981(h)(1).

40 CFR 62.16724(h)(6) & 40 CFR 63.1981(h)(6) – The date of installation and the location of each well or collection system expansion added pursuant to paragraphs 62.16720(a)(3), (4), (b), (c)(4), and 63.1960(a)(3), (4), (b), (c)(4).

There were no wells installed or other collection system expansions made (per the applicable rules) during this semi-annual period.

40 CFR 62.16724(h)(7) & 40 CFR 63.1981(h)(7) – Root cause analysis for any corrective actions required in 62.16720(a)(3), (4) and 63.1960(a)(3)(i), (a)(5) and take more than 60 days to correct exceedance.

There were no corrective actions that took more than 60 days in this semi-annual period.

40 CFR 63.1981(h)(8) – Enhanced monitoring report required in 63.1961(a)(5) and (a)(6) for wells with temperature greater than 62.8 degrees Celsius.

There were no temperature exceedances in this semi-annual that required enhanced monitoring.

SEMI-ANNUAL SSM REPORT PER NESHAP SUBPART A

NESHAP Subpart AAAAA was amended on March 26, 2020. Before September 28, 2021, the facility is required to meet startup, shutdown, and malfunction (SSM) requirements. Beginning no later than September 27, 2021, the requirements of Subpart AAAAA apply at all times, including during periods of SSM, and the SSM requirements of the General Provisions of this part do not apply.³ The periodic SSM Reports required by 40 CFR 63.10(d)(5)(i) are applicable based on their inclusion in Table 1 of NESHAP Subpart AAAAA for periods from July 1, 2021 to September 27, 2021. The regulatory language applicable to SSM Reports is as follows (emphasis added):

*"If actions taken by an owner or operator during a startup or shutdown (and the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards), or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the source's startup, shutdown, and malfunction plan (see §63.6(e)(3)), the owner or operator shall state such information in a startup, shutdown, and malfunction report. Actions taken to minimize emissions during such startups, shutdowns, and malfunctions shall be summarized in the report and may be done in checklist form; if actions taken are the same for each event, only one checklist is necessary. **Such a report shall also include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded.** Reports shall only be required if a startup or shutdown caused the source to exceed any applicable emission limitation in the relevant emission standards, or if a malfunction occurred during the reporting period. The startup, shutdown, and malfunction report shall consist of a letter, containing the name, title, and signature of the owner or operator or other responsible official who is certifying its accuracy, that shall be submitted to the Administrator semiannually..."*

Startup Events

During the reporting period covered by this report, a total of 8 enclosed flare startup events occurred. Of this total number of events, the actions taken in response to 8 startup events were consistent with the SSM Plan. There were 0 startup events that were not consistent with the SSM Plan. During the reporting period, there were no startup events that caused the source to exceed an applicable emission limitation.

Shutdown Events

During the reporting period covered by this report, a total of 8 enclosed flare shutdown events occurred. Of this total number of events, the actions taken in response to 8 shutdown events were consistent with the SSM Plan. There were 0 shutdown events that were not consistent with the SSM Plan. During the reporting period, there were no shutdown events that caused the source to exceed an applicable emission limit.

Malfunction Events

During the reporting period covered by this report, a total of 0 malfunction event occurred (in association with the operation of the open flare and gas treatment system).⁴

³ 40 CFR 63.1930(b)

⁴ For the purposes of SSM reporting, events in which the auto shutoff valve functioned as designed (regardless of the cause of the shutdown) were not reported as malfunctions. For example, power outages were not included as "malfunctions" in this report. While the flare does shutdown during outages, the automatic shutdown functions in a normal manner (eliminating any potential for exceedances).

Ms. Dore LaPosta - Page 6
January 28, 2022

Please note that there were no revisions to the facility's SSM Plan made during the reporting period.

If you have any questions or comments about the information presented in this letter, please do not hesitate to call me at (609) 318-5500 x1755.

Sincerely,

TRINITY CONSULTANTS

A handwritten signature in dark ink, appearing to read "Michael Trupin". The signature is fluid and cursive, with the first name "Michael" and last name "Trupin" clearly distinguishable.

Michael Trupin
Principal Consultant

Attachments

cc: New Jersey Department of Environmental Protection
Bureau of Air Compliance & Enforcement - South
2 Riverside Drive
Suite 201
Camden, NJ 08103

Mr. Gary Conover (Egg Harbor Twp., NJ)

ATTACHMENT 1
CERTIFICATION FORM

CERTIFICATION

Facility ID: 70506
Facility Name: Atlantic County Utilities Authority Landfill

Responsible Official:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attached documents and, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant civil and criminal penalties, including the possibility of fine or imprisonment or both, for submitting false, inaccurate or incomplete information.

Name: Richard Dovey (President) **Signature:**  **Date:** 01 / 28 / 2022

Individuals with Direct Knowledge:

I certify under penalty of law that I believe the information provided in this document is true, accurate and complete. I am aware that there are significant civil and criminal penalties, including the possibility of fine or imprisonment or both, for submitting false, inaccurate or incomplete information.

Name: Gary Conover (Solid Waste Director) **Signature:**  **Date:** 01 / 28 / 2022

Section Being Certified: All

Name: Michael Trupin (Consultant) **Signature:**  **Date:** 01 / 28 / 2022

Section Being Certified: All

Name: _____ **Signature:** _____ **Date:** ____ / ____ / ____

Section Being Certified: _____

Name: _____ **Signature:** _____ **Date:** ____ / ____ / ____

Section Being Certified: _____

